

No. 20-55770

**IN THE UNITED STATES COURT OF APPEALS
FOR THE NINTH CIRCUIT**

TIMOTHY ROBBINS, et al.,
Respondents-Appellants,

v.

ALEJANDRO RODRIGUEZ, et al.,
Petitioners-Appellees.

On Appeal from the United States District Court, Central District of California
No. CV 07-3239-TJH (RNB)

**JOINT MOTION FOR 120 DAY EXTENSION TO FILE PETITION FOR
PANEL REHEARING OR REHEARING EN BANC**

EVA BITRAN (SBN 302081)
ebitrان@aclusocal.org
ACLU Foundation
of Southern California
1313 West Eighth Street
Los Angeles, CA 90017
Telephone: (213) 977-5232

JUDY RABINOVITZ
jrabinovitz@aclu.org
ACLU Immigrants' Rights Project
125 Broad Street, 18th Floor
New York, NY 10004
Telephone: (212) 549-2618

AHILAN ARULANANTHAM
(SBN 237841)
arulanantham@law.ucla.edu
UCLA School of Law
Center for Immigration Law and
Policy
385 Charles Young Drive East
Los Angeles, CA 90095
Telephone: 310-825-1029

JAYASHRI SRIKANTIAH
(SBN 189566)
jsrikantiah@law.stanford.edu
Stanford Law School
Immigrants' Rights Clinic
Crown Quadrangle
559 Nathan Abbott Way
Stanford, CA 94305-8610
Telephone: (650) 724-2442

SEAN A. COMMONS (SBN 217603)
scommons@sidley.com
ALEXANDRIA RUIZ (SBN 313286)
aruiz@sidley.com
SIDLEY AUSTIN LLP
350 South Grand Avenue
Los Angeles, CA 90071
Telephone: (213) 896-6000

The parties respectfully request that this Court extend the deadline to file the Petition for Panel Rehearing or Rehearing En Banc (PFR/EB) by 120 days to afford the parties time to explore settlement negotiations. The Court granted the parties' ten prior requests for an extension of the PFR/EB deadline.

The Memorandum in this Case was issued on October 19, 2021 (ECF 30). At the parties' request, this Court has granted ten extensions of the deadline to file a PFR/EB (ECF 32, 35, 37, 39, 41, 43, 45, 51, 53, 55). The current due date for the PFR/EB is September 23, 2024. The parties respectfully request that the due date be extended by 120 days to January 21, 2025.

Good cause exists for this request. As previously disclosed to this Court, the parties agreed to mediate this matter under the supervision of a federal magistrate judge. The parties have attended multiple mediation sessions with the magistrate. During this time period, the parties have also met and conferred by phone and written correspondence, including by exchanging written settlement proposals.

Given the important interests at stake and the complexity of the issues for consideration, the parties require additional time to determine whether a settlement can be reached. A potential settlement may resolve all, or parts, of Petitioners' claims, including to the relief at issue in this appeal. As such, the parties agree that judicial economy would be best served by continuing to engage in settlement negotiations.

For the foregoing reasons, the parties respectfully request that the deadline to file the Petition for Panel Rehearing or Rehearing En Banc be extended by 120 days. The parties will notify the Court if any additional extensions are warranted because settlement discussions are ongoing.

Respectfully submitted,

Dated: September 20, 2024

s/ Sean A. Commons
SEAN A. COMMONS
Counsel for Petitioners-Appellees

Dated: September 20, 2024

s/ Sarah Wilson (with permission)
SARAH WILSON
Counsel for Respondents-Appellants